

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

MEMORY CONTROL ENTERPRISE, LLC., )	)	
	)	
Plaintiff, )	)	
v. )	)	Case No. 07 C 4903
	)	
AMERICAN HONDA MOTOR COMPANY, )	)	Honorable Charles R. Norgle
INC., LG ELECTRONICS, U.S.A., INC., )	)	Magistrate-Judge Martin C.
MOTOROLA, INC., OAKLEY, INC., and )	)	Ashman
UNITED STATES CELLULAR )	)	
CORPORATION, )	)	
	)	
Defendants. )	)	

**MOTION FOR ENTRY OF AGREED ORDER  
OF PARTIAL DISMISSAL WITH PREJUDICE**

The plaintiff, Memory Control Enterprise, and defendant, LG Electronics, U.S.A. ("LG"), have reached an agreement in settlement of all claims and counterclaims asserted between them. Accordingly, these parties respectfully request that each claim of plaintiff against LG, and each claim and defense of LG against plaintiff, in this action shall be, and hereby are, dismissed with prejudice, plaintiff and LG to bear their own costs and attorneys' fees. Attached for the convenience of the Court is a proposed Order of Partial Dismissal With Prejudice.

This Agreed Order of Partial Dismissal With Prejudice is not intended as a waiver or release of any claims that plaintiff or LG has against any other party or non-party.

AGREED:

Dated: December 7, 2007

Dated: December 7, 2007

/s/ Steven P. Mandell

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing **MOTION FOR ENTRY OF AGREED ORDER OF PARTIAL DISMISSAL WITH PREJUDICE** was electronically filed with the Clerk of Court using CM/ECF system, which will send notification by electronic mail to the following:

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on December 7, 2007

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